

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

IN RE:)
NORTHWEST TERRITORIAL MINT, LLC,)
Debtor.) 16-11767-CMA

DEPOSITION UPON ORAL EXAMINATION OF
ROSS B. HANSEN

9:35 A.M.

AUGUST 1, 2016

925 FOURTH AVENUE, SUITE 2900

SEATTLE, WASHINGTON



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<p style="text-align: right;">Page 66</p> <p>1 A. It set a -- it left a bad taste in my mouth.</p> <p>2 Q. So you were upset about it?</p> <p>3 A. I wasn't really upset. I thought, you know,</p> <p>4 this is silly. But, you know, that's -- the thing is,</p> <p>5 I don't get a vote in this. You know, at that point,</p> <p>6 he's the boss.</p> <p>7 Q. And Mr. Calvert -- you said he asked the</p> <p>8 security people to keep an eye on you to make sure that</p> <p>9 you weren't taking something; is that right?</p> <p>10 A. That was my understanding. Yes.</p> <p>11 Q. And did you object to that?</p> <p>12 A. I had no basis to object.</p> <p>13 Q. Mr. Calvert also took control over the vault in</p> <p>14 Federal Way, did he not?</p> <p>15 A. No.</p> <p>16 Q. He didn't take control over the vault?</p> <p>17 A. No, he did not.</p> <p>18 Q. Did he start to give instructions to the</p> <p>19 security people?</p> <p>20 A. I don't know what instructions he gave the</p> <p>21 security people. But Diane was in the vault until --</p> <p>22 you know, basically doing her usual thing until she</p> <p>23 left on Tuesday afternoon. So she had full access.</p> <p>24 Q. Did Mr. Calvert take control over the business</p> <p>25 operations of the company as of April 11th?</p>	<p style="text-align: right;">Page 68</p> <p>1 A. Not at all.</p> <p>2 Q. Were you upset about him changing the locks?</p> <p>3 A. No. He told me he was going to. And that's</p> <p>4 something a trustee would almost be required to do.</p> <p>5 Q. You don't like Mr. Calvert, do you?</p> <p>6 A. No, I really don't.</p> <p>7 Q. And you are angry with him, aren't you?</p> <p>8 A. Yes.</p> <p>9 Q. And you've told others that you don't like</p> <p>10 Mr. Calvert, haven't you?</p> <p>11 A. That's correct.</p> <p>12 Q. You've been very critical of him, haven't you?</p> <p>13 A. Yes, I have.</p> <p>14 Q. You think you know how to run this business</p> <p>15 better than Mr. Calvert, don't you?</p> <p>16 A. I think I have more knowledge about the</p> <p>17 business than he does. Yes.</p> <p>18 Q. You think you should still be in control of the</p> <p>19 business, don't you?</p> <p>20 A. I believe I should have a part in the business.</p> <p>21 But the bottom line is, is that the Court felt</p> <p>22 differently. The Court appointed a trustee, and that's</p> <p>23 the reality of life. But I think it would be to the</p> <p>24 benefit of the creditors if I played a larger part in</p> <p>25 the company. But that's not for me to decide.</p>
<p style="text-align: right;">Page 67</p> <p>1 A. He did.</p> <p>2 Q. And did you object to that?</p> <p>3 A. No.</p> <p>4 Q. Were you upset about that?</p> <p>5 A. No. I was expecting it.</p> <p>6 Q. Did he tell you that you were not in the chain</p> <p>7 of command any longer?</p> <p>8 A. He did.</p> <p>9 Q. Did he tell you that you were reporting</p> <p>10 directly to him?</p> <p>11 A. No.</p> <p>12 Q. Did Mr. Calvert -- within the first few days of</p> <p>13 his appointment, did he change the locks on any of the</p> <p>14 Mint facilities?</p> <p>15 A. Yes.</p> <p>16 Q. Which ones?</p> <p>17 A. As I understand it, all the locks on all the</p> <p>18 facilities.</p> <p>19 Q. Did you object to that?</p> <p>20 A. The only objection I had was the Dayton</p> <p>21 facility, which I am the leaseholder on. And Medallion</p> <p>22 Art has its items there. And I memorialized that in a</p> <p>23 letter to him on April 12th.</p> <p>24 Q. So you didn't object to him changing the locks</p> <p>25 at Federal Way or Auburn?</p>	<p style="text-align: right;">Page 69</p> <p>1 Q. Do you have any idea, Mr. Hansen, of how many</p> <p>2 creditors, unpaid customers, there are -- prebankruptcy</p> <p>3 customers that have not been paid in this case?</p> <p>4 A. I believe about 2,500.</p> <p>5 Q. And do you have any idea what the dollar amount</p> <p>6 is that those customers are owed?</p> <p>7 A. It's about \$25 million.</p> <p>8 Q. And that's all based on your prior management</p> <p>9 of the company, isn't it?</p> <p>10 A. That is correct.</p> <p>11 Q. You're angry with Mr. Calvert about him</p> <p>12 discussing the FBI investigation, aren't you?</p> <p>13 A. The way he did it, I think was detrimental to</p> <p>14 the morale and the retention of employees within the</p> <p>15 company.</p> <p>16 Q. And you're angry about that, aren't you?</p> <p>17 A. I didn't like how he did it.</p> <p>18 Q. You're angry about it, aren't you?</p> <p>19 A. Yes. I think it served his ego. And I didn't</p> <p>20 think it benefited the company, nor the creditors.</p> <p>21 Q. It was a fact, right, that there was an FBI</p> <p>22 investigation going on, wasn't it?</p> <p>23 A. That was a fact.</p> <p>24 (Deposition Exhibit 3 was marked for</p> <p>25 identification.)</p>



<p style="text-align: right;">Page 70</p> <p>1 Q. (BY MR. GEARIN) Okay. Mr. Hansen, you've been</p> <p>2 handed Deposition Exhibit Number 3. Have you seen that</p> <p>3 email before?</p> <p>4 A. Boy, not since it was sent, months ago.</p> <p>5 Q. But you have seen it before, correct?</p> <p>6 A. I believe I've seen it.</p> <p>7 Q. This is an email from me to Mr. Wenokur,</p> <p>8 correct?</p> <p>9 A. Correct.</p> <p>10 Q. And the date is April 14, 2016, at 10 a.m.,</p> <p>11 correct?</p> <p>12 A. Correct.</p> <p>13 Q. Did you see this email on or about April 14,</p> <p>14 2016?</p> <p>15 MR. FRUSH: I'm sorry. What was the</p> <p>16 question?</p> <p>17 Q. (BY MR. GEARIN) Did you see the email on or</p> <p>18 about April 14, 2016?</p> <p>19 A. I think there was some issue about it getting</p> <p>20 to me. It might have been a day or two late.</p> <p>21 Q. So within a day or two of April 14th, you saw</p> <p>22 the email, correct?</p> <p>23 A. I did. Yes.</p> <p>24 Q. In this email, I talked to Mr. Wenokur, and I</p> <p>25 opened a conversation with Mr. Wenokur about a number</p>	<p style="text-align: right;">Page 72</p> <p>1 you know, who had read something in the paper and</p> <p>2 called me and asked me what was going on. And some of</p> <p>3 them were expressing concern, some of them expressing</p> <p>4 support. There was just, you know, people wanting</p> <p>5 to -- you know, people who you've developed friendships</p> <p>6 over time with were calling and asking me what was</p> <p>7 happening.</p> <p>8 Q. Did you speak with any customers other than the</p> <p>9 bullion customers?</p> <p>10 A. I don't think so.</p> <p>11 Q. Have you spoken with any customers, other than</p> <p>12 bullion customers, since the bankruptcy case was filed?</p> <p>13 Actually, strike that.</p> <p>14 Have you spoken with any customers, other than</p> <p>15 the bullion customers, since Mr. Calvert was appointed?</p> <p>16 A. I don't believe so.</p> <p>17 Q. And you haven't reached out to any customers,</p> <p>18 other than bullion customers? You haven't tried to</p> <p>19 contact any customers of the Mint since Mr. Calvert was</p> <p>20 appointed?</p> <p>21 MR. FRUSH: Objection. You're assuming</p> <p>22 facts not in evidence. He testified that they called</p> <p>23 him.</p> <p>24 MR. GEARIN: I'm asking a separate</p> <p>25 question, Jim.</p>
<p style="text-align: right;">Page 71</p> <p>1 of issues. And one of the things that the email says</p> <p>2 is: The trustee has been informed that Mr. Hansen has</p> <p>3 contacted employees, seeking to have them terminate</p> <p>4 their employment with the company and join a competing</p> <p>5 business to be conducted by Mr. Hansen.</p> <p>6 So as of April 14, 2016, was that true? Were</p> <p>7 you contacting employees and asking them to terminate</p> <p>8 their employment with the company?</p> <p>9 A. No.</p> <p>10 Q. Were you contacting customers of the company as</p> <p>11 of April 14, 2016?</p> <p>12 A. A couple, yes.</p> <p>13 Q. Which customers?</p> <p>14 A. Customers that were calling me, asking me what</p> <p>15 was going on with the company.</p> <p>16 Q. Tell me, in particular, which ones did you talk</p> <p>17 to?</p> <p>18 A. Oh, I think I spoke to a handful of bullion</p> <p>19 customers.</p> <p>20 Q. But you can't remember any specific names?</p> <p>21 A. I don't recall.</p> <p>22 Q. So these would be people who had placed orders</p> <p>23 for bullion, and their orders had not been fulfilled</p> <p>24 yet?</p> <p>25 A. Not necessarily. They're longtime customers,</p>	<p style="text-align: right;">Page 73</p> <p>1 MR. FRUSH: All right. You're asking</p> <p>2 whether he's reached out?</p> <p>3 MR. GEARIN: I'm asking whether he reached</p> <p>4 out, correct.</p> <p>5 A. I have not.</p> <p>6 Q. (BY MR. GEARIN) How about the vendors of</p> <p>7 Northwest Territorial Mint? Have you contacted any</p> <p>8 vendors of the Mint since Mr. Calvert was appointed?</p> <p>9 A. Yes.</p> <p>10 Q. Which ones?</p> <p>11 A. A couple of coin dealers.</p> <p>12 Q. Which coin dealers?</p> <p>13 A. I believe I've spoken to Bill Wolverton. I</p> <p>14 think I've spoken to Renton Coin Shop. I believe I've</p> <p>15 spoken to John Drumme.</p> <p>16 MR. FRUSH: When you say, "vendors," Mike,</p> <p>17 can we get a handle on what you're talking about?</p> <p>18 Because vendors strike me as people who would provide</p> <p>19 goods or services to Mint. That would be a vendor.</p> <p>20 And I just don't want us to go astray here.</p> <p>21 MR. GEARIN: I think that's a fair</p> <p>22 clarification, Jim. I think we are talking about</p> <p>23 people who have provided goods and services to the</p> <p>24 Mint. So I would include manufacturers, people who</p> <p>25 were providing services, people who were providing</p>



<p style="text-align: right;">Page 78</p> <p>1 concept that you had expressed an ownership in personal</p> <p>2 assets and assets that belonged to Medallic Art</p> <p>3 Company. And you had said that there were certain</p> <p>4 personal assets and Medallic assets that were still on</p> <p>5 the business premises of the Mint, correct?</p> <p>6 A. That's correct.</p> <p>7 Q. And I asked you in this email, through</p> <p>8 Mr. Wenokur -- I asked you to provide a list of those</p> <p>9 materials, did I not?</p> <p>10 A. You did.</p> <p>11 Q. And did you ever provide that list?</p> <p>12 A. I did not.</p> <p>13 Q. You never responded to this communication, did</p> <p>14 you?</p> <p>15 A. No, I did not.</p> <p>16 Q. I asked you to provide copies of documents to</p> <p>17 me relating to the Medallic relationship, did I not?</p> <p>18 MR. FRUSH: Objection. The email is not to</p> <p>19 Mr. Hansen. It's to an attorney. I think you're</p> <p>20 mischaracterizing the thrust of the email.</p> <p>21 MR. GEARIN: Well, I think he's already</p> <p>22 testified --</p> <p>23 MR. FRUSH: He said he read it.</p> <p>24 MR. GEARIN: He testified that he read it</p> <p>25 and he understood what the request was.</p>	<p style="text-align: right;">Page 80</p> <p>1 A. I did not.</p> <p>2 Q. I also asked you to confirm that you would</p> <p>3 refrain from contacting employees, customers, vendors,</p> <p>4 and business associates for the purpose of soliciting</p> <p>5 them to another business. Do you remember that?</p> <p>6 A. You asked, yes.</p> <p>7 Q. Did you refrain from contacting employees?</p> <p>8 A. I did not.</p> <p>9 Q. Did you contact the coin dealers -- the three</p> <p>10 coin dealers that we just spoke about, did you contact</p> <p>11 them after April 14th?</p> <p>12 A. I don't recall when I've had these</p> <p>13 conversations. But most likely, yes.</p> <p>14 Q. And you contacted employees after April 14th</p> <p>15 for the purpose of soliciting them to go to work for</p> <p>16 Medallic, did you not?</p> <p>17 A. Yes.</p> <p>18 Q. Have you told employees of the Mint that the</p> <p>19 Mint is going to be liquidated and they will not have a</p> <p>20 job any longer?</p> <p>21 A. No.</p> <p>22 Q. Have you told the employees that Mr. Calvert is</p> <p>23 a liquidator?</p> <p>24 A. Yes.</p> <p>25 Q. Have you told them that the company will be</p>
<p style="text-align: right;">Page 79</p> <p>1 MR. FRUSH: Well, I'm not even sure that</p> <p>2 this attorney, at that point, was even representing</p> <p>3 him. But, anyway, I'll ask that question later.</p> <p>4 Q. (BY MR. GEARIN) Was Mr. Wenokur representing</p> <p>5 you as of April 14, Mr. Hansen?</p> <p>6 A. No. I think I had fired him by that point.</p> <p>7 Q. You think you had fired him. But you already</p> <p>8 did testify that he did pass the communication along to</p> <p>9 you, right?</p> <p>10 A. Yes, he did.</p> <p>11 Q. And you read it, right?</p> <p>12 A. Yes, I did.</p> <p>13 Q. Now, at the end of this letter, I asked for a</p> <p>14 commitment from you that you would not interfere with</p> <p>15 the company's relationships, with the company's</p> <p>16 employees, customers, vendors, of business associates.</p> <p>17 Do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. Do you remember that request?</p> <p>20 A. I see it here.</p> <p>21 Q. Did you ever make that commitment? Did you</p> <p>22 ever commit to Mr. Calvert that you would not interfere</p> <p>23 with the company's relationships between the company</p> <p>24 and the employees, customers, vendors, or business</p> <p>25 associates?</p>	<p style="text-align: right;">Page 81</p> <p>1 liquidated? Have you told employees that the company</p> <p>2 will be liquidated?</p> <p>3 A. I've told employees that most likely the</p> <p>4 company would be liquidated.</p> <p>5 Q. But you haven't suggested to them that their</p> <p>6 jobs would be gone?</p> <p>7 A. I have suggested that most likely their jobs</p> <p>8 would be gone, as a significant amount of employees</p> <p>9 have already found out.</p> <p>10 Q. Let's talk about your contacts with the</p> <p>11 employees. Who have you contacted? Which employees</p> <p>12 have you contacted?</p> <p>13 A. Most of the time, it's been employees</p> <p>14 contacting me. So the employees that I've contacted --</p> <p>15 well, initially, I was given Maura Richardson to speak</p> <p>16 to. But I've talked with Paul Wagner a number of</p> <p>17 times. I've spoken to the die shop in Green Bay and</p> <p>18 most of its employees.</p> <p>19 Q. Give me the specific names of the employees.</p> <p>20 A. I've spoken to --</p> <p>21 MR. FRUSH: Is this you contacting? Or are</p> <p>22 they contacting? I'd like you to be precise,</p> <p>23 Mr. Hansen. It sounds to me like you started your</p> <p>24 answer and it was people that you had reached out to.</p> <p>25 A. (Continuing) Actually, you know what I'm going</p>



<p style="text-align: right;">Page 90</p> <p>1 Q. And what was your purpose in reaching out to</p> <p>2 Mr. Timm?</p> <p>3 A. I wanted to assure him that if he got laid off,</p> <p>4 I would find a home for him at Medallic Art.</p> <p>5 Q. So did you offer him employment through</p> <p>6 Medallic Art?</p> <p>7 A. No. I just told him that he was essential to</p> <p>8 the company. And I wanted to assure him that from what</p> <p>9 I knew, the trustee was talking about making some cuts.</p> <p>10 And if he was on the list, I would like to know about</p> <p>11 it, and I would find alternative employment for him</p> <p>12 through my other company.</p> <p>13 Q. Did you tell him that Mr. Calvert was going to</p> <p>14 liquidate and that his job would be terminated?</p> <p>15 A. I told him that that was a possibility. I told</p> <p>16 him -- I said that if that happened, if he was laid off</p> <p>17 or the company was terminated, I would like him to come</p> <p>18 work for Medallic Art Company.</p> <p>19 Q. Did you ask him to walk out?</p> <p>20 A. No.</p> <p>21 Q. You didn't ask him to leave the Mint or leave</p> <p>22 the employment of the Mint?</p> <p>23 A. Nope.</p> <p>24 Q. Did you offer him present employment with</p> <p>25 Medallic or with somebody else?</p>	<p style="text-align: right;">Page 92</p> <p>1 Q. Do you think you're a well-liked person at the</p> <p>2 Mint, Mr. Hansen?</p> <p>3 A. Would I win a popularity contest? I think --</p> <p>4 I'm not qualified to answer that.</p> <p>5 Q. You don't have an opinion as to whether you're</p> <p>6 well-liked or not at the Mint?</p> <p>7 A. I don't think it matters.</p> <p>8 Q. You don't know whether the employees like you</p> <p>9 or they don't like you?</p> <p>10 A. I don't think it matters.</p> <p>11 Q. Well, I want you to answer the question. Do</p> <p>12 you know whether the employees like you or do not like</p> <p>13 you?</p> <p>14 A. I think most of them do like me.</p> <p>15 Q. So you think you are popular at the Mint?</p> <p>16 A. I wouldn't say I'm popular. I think they like</p> <p>17 what I do, that I'm a competent person, when it comes</p> <p>18 to creating products.</p> <p>19 Q. Do you have a past history of intimidating</p> <p>20 employees at the Mint?</p> <p>21 A. Define "intimidating."</p> <p>22 Q. Have you ever yelled at employees at the Mint?</p> <p>23 A. Of course.</p> <p>24 Q. Have you ever taken employees into your office</p> <p>25 for hours-long meetings and yelled at them?</p>
<p style="text-align: right;">Page 91</p> <p>1 A. No. I told him that in the future, if he</p> <p>2 should lose his job or if they liquidate the Mint, we</p> <p>3 would create a new position for him at Medallic Art</p> <p>4 Company.</p> <p>5 Q. When's the last time you spoke with Mr. Timm?</p> <p>6 A. I think that was the first and only</p> <p>7 conversation I had with him.</p> <p>8 Q. So you just talked to him one time?</p> <p>9 A. Yes.</p> <p>10 Q. The other employee in Green Bay, we'll come</p> <p>11 back and find his name. Did you have more than one</p> <p>12 conversation with him?</p> <p>13 A. No. I just had one.</p> <p>14 Q. Was it the same basic conversation you had with</p> <p>15 Mr. Timm?</p> <p>16 A. Yep. It was mainly to settle them down so that</p> <p>17 they would remain employed with Northwest Territorial</p> <p>18 Mint. A lot of people were expressing concerns and had</p> <p>19 their resumes out. Mr. Calvert is not a well-liked</p> <p>20 person. So I was assuring them that -- you know,</p> <p>21 please stick with your current position. But if you</p> <p>22 should get laid off, or if you get fired by</p> <p>23 Mr. Calvert, we'll find you -- you know, don't fret</p> <p>24 about it. Don't start looking for a job now. Just</p> <p>25 call me, and we'll find you a place at Medallic Art.</p>	<p style="text-align: right;">Page 93</p> <p>1 A. No.</p> <p>2 Q. Did you ever choke a member of your staff?</p> <p>3 A. No.</p> <p>4 Q. You've never choked a member of your staff and</p> <p>5 had the police come to your business premises?</p> <p>6 A. Choked a member of my staff? No.</p> <p>7 Q. That's never happened?</p> <p>8 A. Never happened.</p> <p>9 Q. Have you told your staff that you killed</p> <p>10 somebody in prison?</p> <p>11 A. It's possible.</p> <p>12 Q. So you did tell them that?</p> <p>13 A. I don't recall. Which employee?</p> <p>14 Q. I'm asking you: Have you told any employees</p> <p>15 that you killed someone in prison?</p> <p>16 A. What does this have to do with the contempt</p> <p>17 motion?</p> <p>18 Q. You just started to talk about how Mr. Calvert</p> <p>19 is not popular. And the line of questioning is: Do</p> <p>20 you think you are somebody who is intimidating?</p> <p>21 A. Am I intimidating?</p> <p>22 Q. Are the employees intimidated by you?</p> <p>23 A. I would hope so.</p> <p>24 Q. You hope that they are intimidated by you?</p> <p>25 A. Absolutely.</p>



<p style="text-align: right;">Page 126</p> <p>1 more concerned about legal issues that you had 2 threatened him with. And I said, Well, okay. 3 And he made it very clear that until he got the 4 green light from you, he wasn't going to release the 5 funds. And there was really no -- he was pretty firm 6 on that. So at that point, I left. 7 Q. Did you direct Ms. Erdmann to file a bar 8 complaint against Mr. Tracy regarding the release of 9 the funds? 10 A. No. Actually, she did that all on her own. I 11 didn't even know she was doing it until it was done. I 12 actually would have advised her against that. 13 Q. Okay. I want to talk about the sale of the 14 Graco assets, the Tomball sale. We'll call it the 15 Tomball sale. 16 A. Yes. 17 Q. Do you remember that there was a hearing in the 18 last week of May in front of the Court regarding the 19 sale of the Tomball assets? 20 A. Correct. 21 Q. And you appeared in court in connection with 22 those sale matters, didn't you? 23 A. Correct. 24 Q. And you appeared on behalf of Medallie Art 25 Company, LLC, did you not?</p>	<p style="text-align: right;">Page 128</p> <p>1 Medallie in connection with those objections that were 2 being interposed to the sale, weren't you? 3 A. Well, I was objecting for a number of reasons. 4 I was objecting on behalf of the estate. I was 5 objecting on behalf of what was in the best interest of 6 the company and objecting to the process. I had a 7 number of objections. 8 Q. Well, my question is: You were the 9 representative on behalf of Medallie that interposed 10 the objection to the sale, correct? 11 MR. FRUSH: Objection, to the extent that 12 you're trying to get a legal opinion out of him. 13 Mike, I have no idea what Mr. Stehlik said 14 or didn't say or what Mr. Hansen said or didn't say. 15 But to the extent -- you know, you said, You were 16 objecting on behalf of Medallie. 17 I suspect that the record speaks for itself 18 there. But to the extent you're asking him for a legal 19 conclusion, I'd just enter a continuing objection. 20 MR. GEARIN: Okay. The objection is noted. 21 Q. (BY MR. GEARIN) Mr. Hansen, you can answer the 22 question. 23 A. Well, I was objecting to the whole process. I, 24 you know, one, thought it was a bonehead move. And, 25 two --</p>
<p style="text-align: right;">Page 127</p> <p>1 A. Yes. 2 Q. And you objected to the sale of the Tomball 3 assets on behalf of Medallie, didn't you? 4 MR. FRUSH: I wasn't there. Was he 5 represented by counsel? I just want to make sure where 6 this question is going. 7 MR. GEARIN: Yeah. He was represented by 8 Mr. Stehlik at the hearing. 9 MR. FRUSH: Well, when you're asking him, 10 did he do something, does that encompass Mr. Stehlik 11 representing him? 12 MR. GEARIN: Mr. Hansen was there himself. 13 MR. FRUSH: I'm just wondering who was 14 speaking. Was it Hansen or Stehlik? 15 THE WITNESS: Mr. Stehlik. 16 MR. GEARIN: Mr. Stehlik did most of the 17 speaking. 18 Q. (BY MR. GEARIN) But you spoke, right, 19 Mr. Hansen? 20 A. I don't think I did. 21 Q. You testified, right? You don't remember 22 testifying? You don't remember getting up on the stand 23 and testifying? 24 A. I believe I did. Yes. 25 Q. Right. And you were a representative of</p>	<p style="text-align: right;">Page 129</p> <p>1 Q. I'm not asking you -- 2 A. And I wanted to make it clear that -- 3 Q. You're not answering my question, sir. You're 4 not answering my question. My question was: Were you 5 the representative that interposed the objection on 6 behalf of Medallie? 7 A. Again, I'm not certain on the technicality of 8 that. But, yes, as an interested party, Medallie Art 9 did object. Because Medallie Art had some assets 10 involved in that sale. 11 Q. And you signed a declaration on behalf of 12 Medallie in connection with that objection, right? 13 A. I did. 14 Q. And you testified on behalf of Medallie in 15 connection with that objection, correct? 16 A. Correct. 17 Q. And you sat in court on behalf of Medallie 18 through those sale proceedings, did you not? 19 A. Correct. 20 Q. You also sought to purchase the Tomball assets 21 on behalf of Medallie in connection with those sale 22 proceedings, did you not? 23 A. Correct. 24 Q. And you told the Court that you wanted to 25 tender a bid to buy the assets, right?</p>



<p style="text-align: right;">Page 130</p> <p>1 A. I did.</p> <p>2 Q. Now, I've heard you testify before as to the</p> <p>3 ownership of Medallic. And my understanding is that</p> <p>4 Medallic -- that is, Medallic Art Company, LLC, a</p> <p>5 Nevada LLC -- is owned 50 percent by you and 50 percent</p> <p>6 by Mr. Richard Bressler; is that true?</p> <p>7 A. That's true.</p> <p>8 Q. Did you inform Mr. Bressler that you were</p> <p>9 filing objections to the Tomball sale on behalf of</p> <p>10 Medallic?</p> <p>11 A. I did not.</p> <p>12 Q. Did you talk to Mr. Bressler at all about the</p> <p>13 Tomball sale matters?</p> <p>14 A. I did not. I didn't need to.</p> <p>15 Q. And you didn't need to because you have</p> <p>16 management authority over Medallic?</p> <p>17 A. Yes, I do.</p> <p>18 Q. And you didn't think it was necessary to talk</p> <p>19 to Mr. Bressler about purchasing hundreds of thousands</p> <p>20 of dollars -- or a million dollars or more of assets?</p> <p>21 A. Well, I'm sure I would've informed him at one</p> <p>22 time or another. But as managing member of Medallic</p> <p>23 Art, I have the authority to bind the company.</p> <p>24 Q. Okay. So you can tell Mr. Bressler about it</p> <p>25 after the fact? After you've bound the company, you</p>	<p style="text-align: right;">Page 132</p> <p>1 Q. What did you talk about?</p> <p>2 MR. FRUSH: I'm going to pose an objection,</p> <p>3 to the extent that there was any discussion between</p> <p>4 Mr. Hansen and Mr. Bressler that was at the</p> <p>5 direction -- or communicated legal advice or legal</p> <p>6 opinion.</p> <p>7 So to the extent your conversation didn't</p> <p>8 touch on anything that was privileged, you can talk</p> <p>9 about it. To the extent it dealt with litigation</p> <p>10 strategy, anything you discussed with the attorneys and</p> <p>11 the like, then it's privileged and we'll enter an</p> <p>12 objection to that.</p> <p>13 A. My conversations then would be privileged.</p> <p>14 Q. (BY MR. GEARIN) So you spoke with Mr. Bressler</p> <p>15 about two weeks ago. And before that conversation,</p> <p>16 when was the last time you spoke to him?</p> <p>17 A. A few weeks before that.</p> <p>18 Q. How many times have you spoken with</p> <p>19 Mr. Bressler since the bankruptcy case was filed?</p> <p>20 A. I don't know.</p> <p>21 Q. Did you ask Mr. Bressler to provide the</p> <p>22 funding -- additional funding for Medallic?</p> <p>23 A. No.</p> <p>24 Q. You didn't ask Mr. Bressler to provide funding</p> <p>25 to support the acquisition of the Tomball assets?</p>
<p style="text-align: right;">Page 131</p> <p>1 can go and inform him; is that your understanding?</p> <p>2 A. Had I, yes.</p> <p>3 Q. Did you inform Mr. Bressler that you were</p> <p>4 bidding on the Tomball assets on behalf of Medallic?</p> <p>5 A. My conversations with my partner are not</p> <p>6 germane to this.</p> <p>7 MR. FRUSH: Just answer the questions.</p> <p>8 THE WITNESS: I'm not going to answer the</p> <p>9 questions about what I may or may not have said with my</p> <p>10 partner. It's not important.</p> <p>11 MR. FRUSH: Ross, we don't need to --</p> <p>12 THE WITNESS: I'm not going to let him get</p> <p>13 into what us partners talk about.</p> <p>14 MR. GEARIN: Well, we are going to talk</p> <p>15 about it, Mr. Hansen.</p> <p>16 MR. FRUSH: Ross, you can't -- the judge is</p> <p>17 going to make you testify about this. And if there</p> <p>18 weren't these conversations, then just tell him that</p> <p>19 there weren't conversations.</p> <p>20 A. I had no conversations with him on that.</p> <p>21 Q. (BY MR. GEARIN) When's the last time that you</p> <p>22 spoke with Mr. Bressler?</p> <p>23 A. A couple of weeks ago.</p> <p>24 Q. About two weeks ago?</p> <p>25 A. Yeah.</p>	<p style="text-align: right;">Page 133</p> <p>1 MR. FRUSH: If this was involved in a</p> <p>2 litigation strategy that you discussed with the</p> <p>3 attorneys, I think it's privileged.</p> <p>4 A. It is privileged. Because this involves Tom</p> <p>5 and everybody else.</p> <p>6 Q. (BY MR. GEARIN) Well, I'm not asking you about</p> <p>7 your conversations with your lawyers.</p> <p>8 MR. FRUSH: I think, Mike, if the lawyers</p> <p>9 are saying, All right, Ross, here's what we're going to</p> <p>10 do. See what Dick thinks and report back to us -- then</p> <p>11 I think it's privileged. I think that's work product.</p> <p>12 MR. GEARIN: Well, I don't understand how</p> <p>13 the --</p> <p>14 MR. FRUSH: It's work product, if that's</p> <p>15 what happened. And certainly there's a commonality of</p> <p>16 interest between Mr. Hansen and Mr. Bressler that is</p> <p>17 protected. I mean, even to the extent that there's an</p> <p>18 informal joint litigation agreement. I just don't</p> <p>19 think it's -- I happen to know that these are</p> <p>20 discussions that should be considered, at the very</p> <p>21 least, work product.</p> <p>22 MR. GEARIN: I'm having a difficult time,</p> <p>23 Jim, understanding how conversations -- commitments and</p> <p>24 discussions that he's having with Mr. Bressler about</p> <p>25 funding a bid on the Tomball assets -- how those could</p>



<p style="text-align: right;">Page 134</p> <p>1 be connected to any litigation strategy. I'm having a 2 difficult time with that.</p> <p>3 MR. FRUSH: Well, part of the litigation 4 strategy, as I understand it -- and you know that there 5 are three attorneys, at least, that are advising Ross 6 on this. Two of them are bankruptcy attorneys, 7 Mr. Powers and Mr. Bucknell, with Mr. Stehlik 8 representing Medallie. And I'm involved with those 9 discussions. And, believe me, the lawyers talk a lot 10 with the clients and with Mr. Hansen about the business 11 side of this situation. I mean, I think we expressed 12 to you last week, after the depositions, some of the 13 sort of discussions that are on everybody's mind.</p> <p>14 MR. GEARIN: You don't represent 15 Mr. Bressler, do you, Jim?</p> <p>16 MR. FRUSH: I don't represent Mr. Bressler, 17 but Mr. Bressler has counsel as well. And I just think 18 you're getting into work product and litigation 19 strategy by asking about how certain things that, in 20 the context of this litigation and on the advice of 21 counsel -- that are covered by the attorney-client 22 privilege or work product.</p> <p>23 MR. GEARIN: I disagree with you. But 24 let's reframe the question and make it a little 25 clearer, then.</p>	<p style="text-align: right;">Page 136</p> <p>1 MR. FRUSH: To go to the bathroom.</p> <p>2 MR. GEARIN: In the middle of a question, 3 he's excused himself.</p> <p>4 MR. FRUSH: I'm not following him out 5 there, Mike. He said he had to go to the bathroom. 6 And he said that you and I could resolve this stuff.</p> <p>7 MR. GEARIN: Yeah.</p> <p>8 MR. FRUSH: You're trying to get into work 9 product with the lawyers and how to strategize asset 10 acquiring in this bankruptcy. As you well know -- and 11 he has testified to it -- he's interested in taking 12 back some or all of the Mint through Medallie. And 13 he's interested in making sure that Medallie stays 14 independent from the Mint. And this has been the 15 subject of an enormous amount of conversation by the 16 lawyers and Mr. Hansen. And I just think it's -- if 17 the lawyers say, Talk to your partner about this and 18 explain to him what we're thinking --</p> <p>19 MR. GEARIN: I haven't asked him that 20 question, Jim. I haven't asked him that. You know, up 21 to this point, we've actually done pretty good. Both 22 sides on this.</p> <p>23 MR. FRUSH: Right.</p> <p>24 MR. GEARIN: But I'm telling you, this is 25 hogwash. Right? You are putting a specious discussion</p>
<p style="text-align: right;">Page 135</p> <p>1 MR. FRUSH: All right.</p> <p>2 Q. (BY MR. GEARIN) Did Mr. Bressler commit to 3 provide any funding to Medallie for the purpose of 4 acquiring the Tomball, Texas assets? 5 A. No. 6 Q. No? No was your answer; is that right? 7 A. That's correct. 8 Q. Has Mr. Bressler committed to provide any 9 funding to Medallie, for any purpose, since the 10 bankruptcy case was filed -- since the Mint bankruptcy 11 case was filed? 12 A. I'm not going to answer that.</p> <p>13 MR. FRUSH: I'm sorry. What?</p> <p>14 THE WITNESS: He's asking me again about 15 strategies and --</p> <p>16 MR. FRUSH: But I think you --</p> <p>17 THE WITNESS: While you guys hammer this 18 out, I'm going to go use the restroom. You guys can 19 talk about it. But that really goes into the --</p> <p>20 MR. FRUSH: All right. All right.</p> <p>21 THE WITNESS: Because there's stuff that 22 even you don't know about.</p> <p>23 MR. FRUSH: That's what I'm --</p> <p>24 MR. GEARIN: Let the record reflect that 25 Mr. Hansen has left the room.</p>	<p style="text-align: right;">Page 137</p> <p>1 of privilege and work product in here to seek to 2 disrupt my ability to ask him about legitimate matters.</p> <p>3 These are issues. He's taken the position 4 that Medallie is a viable company, and he has the 5 ability to go hire people. He's telling the employees 6 that he's going to hire them all, he's going to take 7 care of them all, he's going to conduct a business 8 through Medallie, he's going to bid on assets and 9 acquire assets through Medallie. And he hasn't shown 10 that there's any capability for Medallie to do that at 11 all. It is a legitimate line of questioning for me to 12 ask him what funding Medallie has, who is backing 13 Medallie, does Mr. Bressler really know what he's 14 involved in here.</p> <p>15 Those are all legitimate lines of inquiry. 16 And I'm not impinging on anybody's work product 17 or attorney-client privilege in any way. I haven't 18 asked him about any of the conversations that either he 19 or Mr. Bressler have had with any of his lawyers. So 20 for you to interpose that objection right now is clear 21 obstruction. And if we need to, then we'll go get the 22 Court. And we'll get to the bottom of the line of 23 inquiry about Mr. Bressler's involvement and what he's 24 committed to do and what he hasn't committed to do.</p> <p>25 MR. FRUSH: Well, you know, I don't see how</p>



<p style="text-align: right;">Page 150</p> <p>1 said.</p> <p>2 A. That's not what I said.</p> <p>3 Q. (BY MR. GEARIN) Are you aware of any specific</p> <p>4 asset, in Texas, that belongs to Medallion?</p> <p>5 A. Yes.</p> <p>6 Q. What asset?</p> <p>7 A. There are trim tools. There are coining dies.</p> <p>8 There is a tumbler. There is ribbon. There are</p> <p>9 findings. And there is -- did I already say dies?</p> <p>10 Q. You said coining dies.</p> <p>11 A. Yeah. And trim dies, coining dies, and designs</p> <p>12 that belong to Medallion Art Company.</p> <p>13 Q. I observed the testimony you had at the hearing</p> <p>14 to that effect.</p> <p>15 A. But wanting to be thorough, I want to be able</p> <p>16 to make sure I can identify all these. And I need</p> <p>17 access to my records and my inventories and shipping</p> <p>18 records.</p> <p>19 Q. Let's talk about your visit to the Federal Way</p> <p>20 facility on May 18, 2016.</p> <p>21 A. Yes.</p> <p>22 Q. Now, you did come to the premises in Federal</p> <p>23 Way -- the Mint premises in Federal Way on May 18th,</p> <p>24 correct?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 152</p> <p>1 spoke to the security officer. Because I would like to</p> <p>2 have talked to Maura, but she had left the company. So</p> <p>3 Mr. Ward seemed like the logical contact because he was</p> <p>4 the chief -- or he was the security officer. And I</p> <p>5 explained to him that I would be there the next day,</p> <p>6 pursuant to what I thought was an agreement between</p> <p>7 Mr. Stehlik and Mr. Calvert, and that I wanted to make</p> <p>8 sure that there were no issues or problems and that</p> <p>9 everybody was aware of it and that it wouldn't come as</p> <p>10 a surprise.</p> <p>11 Q. You didn't talk to Mr. Calvert about getting</p> <p>12 permission, did you?</p> <p>13 A. No. But I thought Mr. Stehlik had.</p> <p>14 Q. You assumed that?</p> <p>15 A. Through the conversations I had with</p> <p>16 Mr. Stehlik, I thought that had all been arranged.</p> <p>17 Q. I see. Did you know Mr. Calvert was out of</p> <p>18 town on May 18, 2016?</p> <p>19 A. I did not.</p> <p>20 Q. So you showed up at the premises on May 18th.</p> <p>21 What did you do? Did you announce yourself at</p> <p>22 reception and stay in the reception area? Or what did</p> <p>23 you do?</p> <p>24 A. I walked in. I brought an ex-employee with me,</p> <p>25 and --</p>
<p style="text-align: right;">Page 151</p> <p>1 Q. And you came unannounced, didn't you?</p> <p>2 A. No.</p> <p>3 Q. Did you call Mr. Calvert and tell him you were</p> <p>4 coming?</p> <p>5 A. I called Patrick Ward.</p> <p>6 Q. Who is Mr. Ward?</p> <p>7 A. Mr. Ward is the security guard. It was my</p> <p>8 belief that my visit had been approved through</p> <p>9 Mr. Stehlik. But making sure that the word had</p> <p>10 filtered down, I called Mr. Ward and informed him that</p> <p>11 I would be coming midday the next day. And I asked him</p> <p>12 to make sure that that was cleared through Mr. Huffman</p> <p>13 and that everybody was aware of it. Because I didn't</p> <p>14 want any surprises. I did not want exactly what has</p> <p>15 happened -- you guys making something out of nothing.</p> <p>16 So I called, and I explained to him that I</p> <p>17 would be there the next day. And I told him that if</p> <p>18 there was any problem, to give me a call back.</p> <p>19 Q. So you explained to Mr. Ward that you were</p> <p>20 coming. But you didn't ask his permission to come, did</p> <p>21 you?</p> <p>22 A. Well, I thought that had already been worked</p> <p>23 out. And I told him to talk to Mr. Huffman. I asked</p> <p>24 for Mr. Huffman when I first called, and he wasn't</p> <p>25 there. So Mr. Ward is the security officer there, so I</p>	<p style="text-align: right;">Page 153</p> <p>1 Q. What do you mean, "ex-employee"? Who did you</p> <p>2 bring with you?</p> <p>3 A. I brought with me -- for whatever reason, my</p> <p>4 mind is blank right now. I brought Diane's vault guy.</p> <p>5 Anyway, I'll think of his name in just a minute. Don</p> <p>6 Schwenk.</p> <p>7 Q. Mr. Schwenk was with you at the time?</p> <p>8 A. Yes. And I brought him along just to be a</p> <p>9 witness, in case there was a problem. And we walked in</p> <p>10 and were greeted warmly at the front reception desk.</p> <p>11 And I was under the impression that there was no big</p> <p>12 deal. Everything was fine. A number of employees came</p> <p>13 out and greeted us. The receptionist said, Go ahead.</p> <p>14 I asked if it was okay if we go in the back.</p> <p>15 And she said, Yeah, go ahead. Go see Annette.</p> <p>16 Diane and I walked around the counter, and</p> <p>17 Annette was just coming out of her office. She saw us.</p> <p>18 She gave Diane a hug. She shook my hand. I told her</p> <p>19 why I was there. She was surprised, which surprised</p> <p>20 me. And I said, Do you know why I'm here?</p> <p>21 And she said, Gosh, no.</p> <p>22 And I was befuddled because I thought that</p> <p>23 everything had been prearranged. So we stepped back</p> <p>24 into her office. And she said that she had not been</p> <p>25 instructed to give me the file for Medallion Art and</p>



<p style="text-align: right;">Page 154</p> <p>1 that she needed to call Mr. Calvert. And I told her</p> <p>2 that would be fine. She asked for me to wait while she</p> <p>3 made a phone call to Mr. Calvert.</p> <p>4 She called Mr. Calvert, and apparently she was</p> <p>5 not able to get ahold of Mr. Calvert. So she asked for</p> <p>6 me to wait another moment. And she called, I believe,</p> <p>7 one of Mr. Calvert's employees, who said, I don't know</p> <p>8 anything about it. Don't give him anything -- or</p> <p>9 that's what she relayed to me.</p> <p>10 And just as she was telling me that,</p> <p>11 Mr. Huffman walked in. And he was on the phone with</p> <p>12 somebody -- I think he told me it was Paul -- and told</p> <p>13 me that I wasn't authorized to be there and --</p> <p>14 Q. Let me stop you there, Mr. Hansen.</p> <p>15 A. Okay.</p> <p>16 Q. So your testimony is that the receptionist told</p> <p>17 you to go ahead and go back to Ms. Trunkett's office;</p> <p>18 is that right?</p> <p>19 A. Yes.</p> <p>20 Q. You didn't just walk past the receptionist and</p> <p>21 go back to Ms. Trunkett's office?</p> <p>22 A. No. We stopped, and we were talking to</p> <p>23 everybody. People were coming out and shaking my hand</p> <p>24 and saying hi and asking us how we were doing. You</p> <p>25 know, it was kind of like old home week.</p>	<p style="text-align: right;">Page 156</p> <p>1 go. And he asked if I wanted him to go with me. And I</p> <p>2 said, No. Because every time you go me with, it costs</p> <p>3 me a lot of money.</p> <p>4 And he said, Well, take somebody who can be a</p> <p>5 witness, in case there's a problem.</p> <p>6 And I said, Okay. I'll do that.</p> <p>7 Q. So you didn't see anything in writing from me</p> <p>8 to Mr. Stehlik that granted you permission to come into</p> <p>9 the premises, did you?</p> <p>10 A. No. That was told to me by Mr. Stehlik.</p> <p>11 Q. When you talked to Ms. Trunkett, did you tell</p> <p>12 her that you had Mr. Calvert's permission to pick the</p> <p>13 records up?</p> <p>14 A. I told her that my attorney had told me that he</p> <p>15 had worked out a deal with -- I believe it was with</p> <p>16 you -- to pick up the records -- pick up a copy of the</p> <p>17 records of Medallion Art Company.</p> <p>18 Q. That's what you told Ms. Trunkett? You</p> <p>19 specifically told her that your attorney had worked out</p> <p>20 an agreement with me?</p> <p>21 A. I believe that's what I told her.</p> <p>22 Q. You didn't tell her that you had the authority</p> <p>23 to pick the records up?</p> <p>24 MR. FRUSH: Objection.</p> <p>25 A. Well, I don't know what the difference is.</p>
<p style="text-align: right;">Page 155</p> <p>1 Q. Did you ask for permission to go back to</p> <p>2 Ms. Trunkett's office?</p> <p>3 A. I think she just said -- I said, We just need</p> <p>4 to go back and pick up some stuff. And she was, like,</p> <p>5 Go ahead.</p> <p>6 I asked her if it was okay.</p> <p>7 Q. Did you tell Ms. Trunkett that you had the</p> <p>8 authority to pick up records from the Mint offices?</p> <p>9 A. Yes, I did.</p> <p>10 Q. All right. Did you tell her that you had the</p> <p>11 trustee's authority to pick up the records?</p> <p>12 A. I told her that it had been arranged between</p> <p>13 Mr. Stehlik and Mr. Calvert for me to pick up the</p> <p>14 records of Medallion Art Company. That's what I</p> <p>15 believed at the time.</p> <p>16 Q. Do you still believe that to be true?</p> <p>17 A. Mr. Calvert said that he never made such an</p> <p>18 agreement with Mr. Stehlik, and I'm confused. To me,</p> <p>19 it was -- I showed up there. It was kind of a waste of</p> <p>20 my time.</p> <p>21 Q. Did you ever see anything in writing between</p> <p>22 Mr. Stehlik and me about an agreement to allow you to</p> <p>23 have access to the Mint premises to pick records up?</p> <p>24 A. I don't recall what I saw. I just know that</p> <p>25 Mr. Stehlik sent me an email saying that it was good to</p>	<p style="text-align: right;">Page 157</p> <p>1 Q. (BY MR. GEARIN) Well, I want to talk about</p> <p>2 precise language. I want to talk about what words you</p> <p>3 used. Did you use the words -- when you spoke to</p> <p>4 Ms. Trunkett, did you tell her: I have the authority</p> <p>5 to pick the records up?</p> <p>6 A. I told her that I had permission to pick the</p> <p>7 records up.</p> <p>8 Q. But you didn't use the word "authority"?</p> <p>9 A. Well, authority? What's the authority? Define</p> <p>10 "authority."</p> <p>11 Q. Well, do you remember what words you used?</p> <p>12 A. No, I really don't. I didn't think it was a</p> <p>13 big deal. I mean, come on. You know, get your tail</p> <p>14 out of a twist and quit trying to make a mountain out</p> <p>15 of a molehill.</p> <p>16 MR. FRUSH: Ross, no speeches, please.</p> <p>17 Just keep the record clean.</p> <p>18 THE WITNESS: Jesus Christ.</p> <p>19 Q. (BY MR. GEARIN) You have a difficult time,</p> <p>20 sir, answering a direct question. I was asking --</p> <p>21 MR. FRUSH: Well, he was answering.</p> <p>22 Q. (BY MR. GEARIN) I asked you a direct question</p> <p>23 about what words you used when you spoke with</p> <p>24 Ms. Trunkett. And now you want to try to twist that</p> <p>25 around and not give me a direct answer to that</p>



<p style="text-align: right;">Page 158</p> <p>1 question. So I have to continue to ask you the same</p> <p>2 question on multiple occasions. That's why we've been</p> <p>3 here as long as we have.</p> <p>4 MR. FRUSH: Objection. Asked and answered.</p> <p>5 He's answered that question three times now. And now</p> <p>6 he's elaborated on it. He's told you that he doesn't</p> <p>7 remember whether it was "permission" or "authority."</p> <p>8 Let's move on.</p> <p>9 MR. GEARIN: It took him multiple occasions</p> <p>10 to answer the specific question.</p> <p>11 Q. (BY MR. GEARIN) Mr. Hansen, did you produce --</p> <p>12 you produced a letter, right?</p> <p>13 A. Yes.</p> <p>14 Q. You waved a letter around when you walked into</p> <p>15 the premises, right?</p> <p>16 MR. FRUSH: Objection. This is</p> <p>17 argumentative. You waved. You demanded. You showed</p> <p>18 up.</p> <p>19 You know, did you present a letter? I</p> <p>20 mean, you're being very argumentative. I've tried to</p> <p>21 keep my objections to a minimum.</p> <p>22 MR. GEARIN: I don't think it is</p> <p>23 argumentative at all.</p> <p>24 Q. (BY MR. GEARIN) Mr. Hansen, did you bring a</p> <p>25 letter into the premises of the Mint on May 18th?</p>	<p style="text-align: right;">Page 160</p> <p>1 Mr. Hansen.</p> <p>2 A. I don't have the letter in front of me, but I</p> <p>3 don't recall. I remember it was a continuation of a</p> <p>4 discussion that I had had with Maura, who told me that</p> <p>5 there were records waiting for me. And it was just --</p> <p>6 to me, it was a big nonissue. There was a box of</p> <p>7 records down there that belonged to me. Mr. Stehlik</p> <p>8 had spoken to you about it. And it didn't seem like it</p> <p>9 was a big issue.</p> <p>10 Q. You don't remember that the letter that you</p> <p>11 brought on May 18th said: I asked Mr. Calvert's</p> <p>12 attorney some time ago to provide these records, but he</p> <p>13 has not responded?</p> <p>14 You don't remember that?</p> <p>15 A. I don't recall.</p> <p>16 Q. You don't remember if that was the letter?</p> <p>17 A. I don't recall.</p> <p>18 Q. But your testimony is that you believed, when</p> <p>19 you went to the premises on May 18th -- you thought</p> <p>20 that your attorney had reached an agreement with</p> <p>21 Mr. Calvert's attorney, correct?</p> <p>22 A. I wasn't sure if he had spoken to Mr. Calvert</p> <p>23 at the hearing that we had just attended. But there</p> <p>24 was some understanding, I believed, between yourself or</p> <p>25 Mr. Calvert -- and Maura had confirmed it -- that there</p>
<p style="text-align: right;">Page 159</p> <p>1 A. Yes, I did.</p> <p>2 Q. Did you show that letter to the employees of</p> <p>3 the Mint and purport that that letter granted you</p> <p>4 authority to pick the records up?</p> <p>5 A. Yes. Not authority, but it gave me permission.</p> <p>6 Q. "Permission" was the word you used?</p> <p>7 A. I used the word "permission."</p> <p>8 Q. Mr. Hansen, I'm just going to show you -- I'm</p> <p>9 not going to mark it as an exhibit. I know this is</p> <p>10 really not legible. But I want you to look at that</p> <p>11 page there and then the back side of that document.</p> <p>12 And I want to ask you if you recognize the language</p> <p>13 that's on that back side there?</p> <p>14 A. Yes. What about it?</p> <p>15 Q. Is that the language that was on the</p> <p>16 letter that --</p> <p>17 A. I don't recall.</p> <p>18 Q. You don't recall.</p> <p>19 Mr. Stehlik's letter -- the letter you had with</p> <p>20 you on May 18th -- didn't say that Mr. Stehlik had</p> <p>21 reached an agreement with the trustee to provide access</p> <p>22 to the records, did it?</p> <p>23 MR. FRUSH: Objection. The letter speaks</p> <p>24 for itself.</p> <p>25 Q. (BY MR. GEARIN) You can answer the question,</p>	<p style="text-align: right;">Page 161</p> <p>1 was a box of records that was in the accounting</p> <p>2 department that we could pick up.</p> <p>3 Q. So the letter that Mr. Stehlik provided to you,</p> <p>4 that you brought to the Mint on May 18th, did he</p> <p>5 prepare that the day before, May 17th?</p> <p>6 A. I don't recall.</p> <p>7 Q. Do you recall Mr. Stehlik saying to you in the</p> <p>8 letter, I'm aware that you're going to try to gain</p> <p>9 access to the Mint's offices in Federal Way, and I hope</p> <p>10 that Mr. Calvert will cooperate with you and allow you</p> <p>11 access?</p> <p>12 Do you recall him telling you that?</p> <p>13 A. Well, Mr. Calvert had told me previously that</p> <p>14 if I needed access --</p> <p>15 Q. Mr. Hansen, you're not answering my question</p> <p>16 again. I need to interrupt you. You're not answering</p> <p>17 my question.</p> <p>18 A. I don't recall what the letter from Mr. Stehlik</p> <p>19 to me said. Based upon prior representations by both</p> <p>20 Mr. Calvert and also by Maura Richardson, and by what</p> <p>21 my conversation with Mr. Stehlik was, I believed that I</p> <p>22 had permission to come to the office and pick up a box</p> <p>23 of records. And that's why I called the day before and</p> <p>24 spoke with security, just to confirm all of that. And</p> <p>25 I said, If there's any problem, please call me back.</p>



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1 And nobody called me back.

2 Q. So you believe that you obtained permission to

3 visit the Mint's premises by calling one of the

4 security officers at the Mint? Is that what you're

5 saying?

6 A. No. I believe that by prior agreement with

7 Mr. Calvert, subsequent conversations with

8 Ms. Richardson, and conversations that Mr. Stehlik had

9 with either yourself or Mr. Calvert, that permission to

10 pick up the box of records that did not belong to you,

11 that belonged to me -- that that was okay. And out of

12 an abundance of caution, I called the day before and

13 wanted to make sure. Because I knew that attorneys

14 such as yourself -- and you're doing exactly what I was

15 worried about -- would make a mountain out of a

16 molehill. So I said, Please, if there's a problem,

17 call me back, and I won't come down.

18 Because I did not want to end up in the very

19 position that I'm in today, being accused of doing

20 something wrong.

21 Q. Tell me again, who did you have this

22 conversation with? The security officer?

23 A. Patrick Ward. And when I was there,

24 Mr. Huffman acknowledged that I had spoken with Patrick

25 Ward but chided me that Patrick Ward was the wrong

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1 person to call, that I should have called him.

2 Q. But you didn't call Mr. Huffman, did you?

3 A. Well, I asked for Mr. Huffman. But Mr. Huffman

4 was out of the office when I called. And I explained

5 to Mr. Ward -- I said, I'm coming down tomorrow to pick

6 up some records. I believe it's all been worked out.

7 I just want to make sure that my visit isn't going to

8 cause any problems. And if it is going to cause a

9 problem, please call me back, and I won't come down.

10 Q. Did you demand that Ms. Trunkett give you

11 original records from your office?

12 MR. FRUSH: Objection.

13 A. I made no demand to her. All I asked for

14 was -- I had been told by Maura Richardson that there

15 was a box of records that Mr. Calvert would not release

16 until they were copied. They had been copied, and they

17 were now available to pick up. And so I believed that

18 I was picking up a box of copies of the records.

19 Q. (BY MR. GEARIN) Did you record the

20 conversation with Ms. Trunkett while you were at the

21 Mint on May 18th?

22 A. Yes, I did.

23 Q. Do you have a copy of the recording?

24 A. I do.

25 Q. I'm going to ask your counsel to produce that

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1 recording to me.

2 A. Okay.

3 MR. GEARIN: I would like a copy.

4 Q. (BY MR. GEARIN) When Mr. Huffman came and

5 interceded and told you that you needed to leave, did

6 you try to push past him to get to the office?

7 A. No.

8 Q. What did you say to Ms. Trunkett when you were

9 leaning over her desk at that meeting? What did you

10 say to her?

11 MR. FRUSH: Objection. Assumes facts not

12 in evidence. You haven't asked him where he was in

13 relation to --

14 MR. GEARIN: Okay. Well, let's go back to

15 that.

16 Q. (BY MR. GEARIN) Mr. Hansen, when you walked

17 in, I think you said you engaged with Ms. Trunkett and

18 you went into her office.

19 A. I did.

20 Q. Did she sit down?

21 A. I believe she went on the other side of her

22 desk so she could make the phone call to Mr. Calvert.

23 Q. Then did she sit down at her desk?

24 A. I believe she did.

25 Q. And did you stand over the top of her desk?

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1 A. I was on the other side of her desk.

2 Q. Okay. Did you put your hands on her desk?

3 A. I don't recall.

4 Q. Did you lean over the desk?

5 A. I don't think so. I was -- it was a friendly,

6 cordial conversation.

7 Q. All right. What did you say to her?

8 A. I asked her what her plans were with the

9 company. And I asked her if I was -- if I -- that I

10 hoped to take back the company and that I -- that if I

11 do take back the company, I asked her if she would

12 consider coming to work for me. And she said that her

13 back was causing her such grief, that what she really

14 wanted to do was -- she was waiting to hear a decision

15 on her application for a disability. And she really

16 wanted not to be working anymore. She wanted to go on

17 disability because she was in a lot of pain.

18 Q. Did you tell Ms. Trunkett that you were

19 recording her conversation?

20 A. I did not.

21 Q. Did you tell Mr. Huffman that you were

22 recording the conversation?

23 A. I did not.

24 Q. Did you record the conversation with

25 Mr. Huffman as well?



<p style="text-align: right;">Page 166</p> <p>1 A. I had a recorder in my pocket. I don't think I</p> <p>2 had the opportunity to tell him anything. He came in,</p> <p>3 and he was very forceful. He ordered me to leave, and</p> <p>4 I left immediately.</p> <p>5 Q. But you did offer Ms. Trunkett a job; is that</p> <p>6 right?</p> <p>7 MR. FRUSH: Objection. Asked and answered.</p> <p>8 He's testified as to the conversation.</p> <p>9 A. I said that if I took back over the company, I</p> <p>10 wish she would stay employed with us. Yes.</p> <p>11 Q. (BY MR. GEARIN) Did you try to get</p> <p>12 Ms. Trunkett to leave her employment with the Mint?</p> <p>13 A. No, I did not.</p> <p>14 (Deposition Exhibit 5 was marked for</p> <p>15 identification.)</p> <p>16 Q. (BY MR. GEARIN) Let's look at the face page of</p> <p>17 this, Mr. Hansen. This is now what has been marked as</p> <p>18 Deposition Exhibit Number 5. Do you recognize this?</p> <p>19 A. Yes, I do.</p> <p>20 Q. Is this your declaration that you just filed on</p> <p>21 Friday with the court?</p> <p>22 A. It is.</p> <p>23 Q. Let's go to Exhibit C of this declaration,</p> <p>24 which is the email that we earlier discussed, the email</p> <p>25 that you sent to Ms. Richardson.</p>	<p style="text-align: right;">Page 168</p> <p>1 Q. When did you speak to Ms. Richardson about your</p> <p>2 mail?</p> <p>3 A. During the couple of weeks she was there,</p> <p>4 before she left. And she had told me that -- she was</p> <p>5 squirrely about it. She said that Mr. Calvert had</p> <p>6 wanted to go through my mail and look at my mail and</p> <p>7 that it wasn't her decision to give it to me.</p> <p>8 Q. So that would have been in April of 2016,</p> <p>9 correct?</p> <p>10 A. Correct.</p> <p>11 Q. And when did you talk to Ms. Trunkett about</p> <p>12 your mail?</p> <p>13 A. I believe in one of my phone calls down there</p> <p>14 about my financial records, I asked her about it. I</p> <p>15 also saw her in court here a while back, and I asked</p> <p>16 her about it. She said that she wasn't handling the</p> <p>17 mail, that that was going through Jodi.</p> <p>18 Q. Did you call Jodi?</p> <p>19 A. I did.</p> <p>20 Q. You called her at the Mint and spoke with her?</p> <p>21 A. Yes.</p> <p>22 Q. When did you do that?</p> <p>23 A. Sometime in April, I believe.</p> <p>24 Q. Okay. Let's focus on paragraph 11 to your</p> <p>25 declaration, the issues with Ms. Krum.</p>
<p style="text-align: right;">Page 167</p> <p>1 A. Okay.</p> <p>2 Q. Well, strike that question. I think we've</p> <p>3 already covered that ground. I think we've already</p> <p>4 talked about this.</p> <p>5 Let's talk about your issues in paragraph 10,</p> <p>6 where you talk about your personal mail.</p> <p>7 A. I'm sorry. Which --</p> <p>8 Q. Paragraph 10.</p> <p>9 A. Oh, in the declaration. Okay.</p> <p>10 Q. You say: I have requested that the Mint</p> <p>11 forward to me personal mail, including mail related to</p> <p>12 healthcare.</p> <p>13 Who did you make a request to to have your</p> <p>14 personal mail forwarded to you?</p> <p>15 A. I have spoken to Mr. Calvert. I have spoken to</p> <p>16 Ms. Richardson. I have spoken to Ms. Trunkett. And I</p> <p>17 have spoken to -- I believe it was a lady named Jodi.</p> <p>18 I apologize. Is that one of Mr. Calvert's helpers down</p> <p>19 there?</p> <p>20 Q. Yeah. So when did you talk to Mr. Calvert</p> <p>21 about your personal mail?</p> <p>22 A. When I left. And then I spoke to him at one of</p> <p>23 the hearings. And I asked him if there was a reason I</p> <p>24 wasn't getting it. And he said, No, but I'll look into</p> <p>25 it.</p>	<p style="text-align: right;">Page 169</p> <p>1 A. Yes.</p> <p>2 Q. You say, in your declaration, that when</p> <p>3 Ms. Krum was on maternity leave, the custom software in</p> <p>4 her machine had been corrupted. And Ms. Krum was</p> <p>5 concerned that it would be corrupted again.</p> <p>6 Is that your recollection? When Ms. Krum was</p> <p>7 on maternity leave, the software in her engraving</p> <p>8 machine was corrupted?</p> <p>9 A. Yes. It was actually the parameters of where</p> <p>10 the engraving pads are, which are hard to set up, as I</p> <p>11 understand it. I've never run that machine. But she</p> <p>12 was pretty upset, when she came back, that the</p> <p>13 parameters for the different engraving pads in the</p> <p>14 engraving areas on the different types of coins had</p> <p>15 been, quote, screwed up. And she was furious about it.</p> <p>16 She said, I almost quit over it.</p> <p>17 Q. So if the software on the engraving machine was</p> <p>18 corrupted, would that cause problems for the company?</p> <p>19 A. Well, as I understand it, the software itself</p> <p>20 is off-the-shelf software. It's the parameters of the</p> <p>21 engraving pad that are the problem. So I think there's</p> <p>22 some difference between the software and the engraving</p> <p>23 pads.</p> <p>24 Q. So you're saying that there's actually some</p> <p>25 input that someone at the Mint has put into the</p>



<p style="text-align: right;">Page 170</p> <p>1 software that runs the engraving machine; is that</p> <p>2 correct?</p> <p>3 A. As I understand it, yes. She has actually put</p> <p>4 in some parameters so that -- it just makes it easier</p> <p>5 to operate.</p> <p>6 Q. And those engraving pads, are those templates?</p> <p>7 A. Yes.</p> <p>8 Q. Those are templates for additional product that</p> <p>9 she would make?</p> <p>10 A. Well, no. What happens -- if I can explain --</p> <p>11 is, each of the different products that we have has a</p> <p>12 different area on it that is engravable, and those are</p> <p>13 templates that are put into the machine. And it</p> <p>14 downloads from the website so that you can pull up that</p> <p>15 program. It will show you where, on that coin, it will</p> <p>16 engrave. And she was very concerned about -- she told</p> <p>17 me she was on the verge of walking out. I did</p> <p>18 everything I could to tell her not to. And she said,</p> <p>19 Well, if I come back and the machine is screwed up, I'm</p> <p>20 not going to redo this machine again.</p> <p>21 And I said, Well, if you do walk out, copy your</p> <p>22 parameters so you can put them back in. I mean, that's</p> <p>23 the solution. I said, You know, come on. You're a big</p> <p>24 girl. You don't need to walk out.</p> <p>25 Q. But the point is that if that software was</p>	<p style="text-align: right;">Page 172</p> <p>1 leave?</p> <p>2 A. No, I don't.</p> <p>3 Q. Do you recall how old her child is?</p> <p>4 A. About a year old.</p> <p>5 Q. So is it your recollection that this</p> <p>6 conversation with Ms. Krum about copying the files was</p> <p>7 a year or so ago?</p> <p>8 MR. FRUSH: Objection.</p> <p>9 A. No, not at all. It was -- the first</p> <p>10 conversation about this was at my house, and it was a</p> <p>11 couple days after we quit. Sometime in April.</p> <p>12 Q. (BY MR. GEARIN) So it was not contemporaneous</p> <p>13 with her coming back from maternity leave. It was</p> <p>14 actually much later than that, that you talked to her</p> <p>15 about copying the files?</p> <p>16 A. Correct. She --</p> <p>17 MR. FRUSH: Objection. I think you're</p> <p>18 mischaracterizing his testimony. His testimony was</p> <p>19 that she had a problem when she came back from</p> <p>20 maternity leave, and that's what they talked about --</p> <p>21 the same type of problem.</p> <p>22 MR. GEARIN: I'm not mischaracterizing.</p> <p>23 I'm trying to get to the bottom of the timing of when</p> <p>24 he had this conversation with Ms. Krum. I could be</p> <p>25 mistaken. I could be assuming that it was a year or</p>
<p style="text-align: right;">Page 171</p> <p>1 corrupted or destroyed, it actually would cause delay,</p> <p>2 time, expense --</p> <p>3 A. A little bit. I think it's just more of a</p> <p>4 hassle than --</p> <p>5 Q. Mr. Hansen, let me finish the question. It</p> <p>6 would cause delay, expense, trouble for the company; is</p> <p>7 that true?</p> <p>8 A. I think so. Yeah.</p> <p>9 Q. And your testimony is that you told Ms. Krum to</p> <p>10 copy the software, the engraving pads, when she came</p> <p>11 back from maternity leave?</p> <p>12 A. Yeah. What I told her is -- I said, Make two</p> <p>13 copies. Take one copy and put it in the safe down</p> <p>14 there, and take the other copy with you.</p> <p>15 And I said, That way -- you know, I asked her</p> <p>16 if there was a copy of the -- I asked her, How did you</p> <p>17 allow it to get screwed up in the first place? I said,</p> <p>18 Isn't anybody backing that machine up?</p> <p>19 And she said, No.</p> <p>20 And I said, Well, immediately go make some</p> <p>21 copies of it and go put one of the copies in the safe</p> <p>22 down there so that if, for whatever reason, it gets</p> <p>23 corrupted again, by accident or on purpose, somebody</p> <p>24 can reload it into the machine.</p> <p>25 Q. Do you recall when Ms. Krum went on maternity</p>	<p style="text-align: right;">Page 173</p> <p>1 two ago.</p> <p>2 Q. (BY MR. GEARIN) You're telling me it wasn't.</p> <p>3 You're telling me the conversation was in April or May</p> <p>4 of 2016?</p> <p>5 A. Correct. And what happened was, after we left</p> <p>6 the company, Ms. Krum was at our home. And she was</p> <p>7 expressing her great unhappiness with the situation,</p> <p>8 with Mr. Calvert, and especially with Mr. Wagner, and</p> <p>9 how much she disliked Mr. Wagner. And she was telling</p> <p>10 me that she had put her resume out and that her and a</p> <p>11 couple of other employees were prepared to walk out the</p> <p>12 door. And she was just waiting to get a new job.</p> <p>13 Q. You know Ms. Krum pretty well, don't you?</p> <p>14 A. She more Diane's friend.</p> <p>15 Q. Do you think Ms. Krum is a truthful person?</p> <p>16 A. No, not really.</p> <p>17 Q. So you're saying that it was Ms. Krum that</p> <p>18 talked to you about walking out, not the other way</p> <p>19 around?</p> <p>20 A. That's correct.</p> <p>21 Q. You've heard Ms. Krum's testimony to the effect</p> <p>22 that you asked her to delete files from the Mint</p> <p>23 computer. Is that true?</p> <p>24 A. That's not true. That would not serve my</p> <p>25 interest.</p>



<p style="text-align: right;">Page 174</p> <p>1 Q. Back in paragraph 11 of your declaration, you</p> <p>2 talk about "in the event the trustee lays off Ms. Krum</p> <p>3 or she is employed elsewhere." Did you have some</p> <p>4 indication that the trustee was going to lay Ms. Krum</p> <p>5 off?</p> <p>6 A. No. Ms. Krum had talked about quitting. And</p> <p>7 this actually was over a three- or four-conversation</p> <p>8 period. It wasn't in one conversation. And she had</p> <p>9 expressed her unhappiness. She was afraid that the</p> <p>10 company was going to implode and that she could be laid</p> <p>11 off. And she just had the concerns that all the</p> <p>12 employees have. And I assured her that she had a very</p> <p>13 valuable position and that she needed to remain there.</p> <p>14 Q. All right.</p> <p>15 A. But she was concerned that Mr. Wagner didn't</p> <p>16 like her and that he would lay her off because he</p> <p>17 didn't like her.</p> <p>18 Q. Okay. So she was concerned about getting laid</p> <p>19 off. You had not necessarily heard from someone else</p> <p>20 that she might be laid off?</p> <p>21 A. That's correct.</p> <p>22 Q. Did you tell her that she might be laid off?</p> <p>23 A. I told her -- I said -- she asked me what I</p> <p>24 knew about the company. And she -- the wildfire</p> <p>25 through the company about, you know, Tomball, Texas and</p>	<p style="text-align: right;">Page 176</p> <p>1 than those issues?</p> <p>2 MR. GEARIN: No. I think that's probably</p> <p>3 where I am. It's about 3:25 right now.</p> <p>4 MR. FRUSH: Right. What time is our call?</p> <p>5 MR. GEARIN: 3:55.</p> <p>6 MR. FRUSH: All right. What are the</p> <p>7 questions that you want to raise with the Court? Let's</p> <p>8 use this time to make sure we're all talking about the</p> <p>9 same thing.</p> <p>10 MR. GEARIN: Yeah. I want to talk about</p> <p>11 the funding -- actually, let's take this discussion off</p> <p>12 the record.</p> <p>13 (Discussion off the record.)</p> <p>14 MR. GEARIN: Let's go back on the record.</p> <p>15 MR. FRUSH: Okay. We're on the record.</p> <p>16 EXAMINATION</p> <p>17 BY MR. FRUSH:</p> <p>18 Q. Do you want the Mint to fail?</p> <p>19 A. No.</p> <p>20 Q. Why?</p> <p>21 A. I believe it's in the best interest of the</p> <p>22 employees and the creditors of the Mint for the Mint to</p> <p>23 succeed. And it's vital, for the Mint to succeed,</p> <p>24 that -- the Mint is made up -- the greatest asset the</p> <p>25 Mint has is not its equipment. It's its employees and</p>
<p style="text-align: right;">Page 175</p> <p>1 everybody losing their jobs and everything else, was --</p> <p>2 you know, I think there was some contemplation, at that</p> <p>3 time, about it being shut down and just a lot of</p> <p>4 nervousness. And I told her that she held a very</p> <p>5 valuable position and that I think she would be one of</p> <p>6 the last people that they would lay off.</p> <p>7 And she talked about how her and Paul didn't</p> <p>8 get along and that she hated Paul. And Paul, she</p> <p>9 thought, had it in for her and that if Paul had the</p> <p>10 opportunity, Paul would lay her off and get somebody</p> <p>11 else to do her job.</p> <p>12 Q. Did you tell Ms. Krum that you wanted to hire</p> <p>13 her?</p> <p>14 A. Yes. I told her that I thought she was an</p> <p>15 excellent employee and that if she couldn't stand it</p> <p>16 there any longer or if she got laid off, to give me a</p> <p>17 call. And I would find work for her until I could get</p> <p>18 her a position at Medallion Art Company.</p> <p>19 Q. Is that still the case? Would you still want</p> <p>20 to hire Ms. Krum?</p> <p>21 A. No.</p> <p>22 MR. GEARIN: All right. The rest of my</p> <p>23 questions, I think, relate back to the issues that we</p> <p>24 need to address with the judge.</p> <p>25 MR. FRUSH: You've got nothing else, other</p>	<p style="text-align: right;">Page 177</p> <p>1 its relationships with its customers. And it's very</p> <p>2 important that we maintain all of those assets.</p> <p>3 Q. Have you ever asked an employee to quit the</p> <p>4 Mint?</p> <p>5 A. No, I have not.</p> <p>6 Q. Has it always been your intention, since this</p> <p>7 matter went into bankruptcy, to hopefully regain</p> <p>8 control of the Mint?</p> <p>9 A. I would like to reorganize the Mint. Yes.</p> <p>10 Q. Would it be contrary to your desires and</p> <p>11 interests to sabotage equipment at the Mint?</p> <p>12 A. It would be against my best interest and the</p> <p>13 Mint's best interest. It would be in no one's</p> <p>14 interest. It would serve no purpose to sabotage any</p> <p>15 portion of the Mint.</p> <p>16 Q. Did you ask Ms. Krum to sabotage any machines?</p> <p>17 A. I did not.</p> <p>18 Q. Was it the case that you were concerned that if</p> <p>19 you took over the Mint again and she had quit, that she</p> <p>20 needed to have a copy of the software -- whatever you</p> <p>21 call it -- the parameters, so she could come back to</p> <p>22 get back to work in a productive fashion?</p> <p>23 A. Not only did I do that, but I asked her to make</p> <p>24 two copies and put one in the safe at the Mint. So if</p> <p>25 it did get corrupted, if I did not take over the Mint,</p>



<p style="text-align: right;">Page 178</p> <p>1 or if there was somebody else in place, that there</p> <p>2 would be a copy, you know, on the premises. I was</p> <p>3 appalled that there was no backup of her machine and</p> <p>4 was instructing her to immediately make a backup and</p> <p>5 give one copy to the powers that be who are there</p> <p>6 currently.</p> <p>7 Q. When you visited the Federal Way facility on</p> <p>8 May 18th, did you announce to anyone there that you</p> <p>9 were recording the exchange?</p> <p>10 A. I walked in, and I had a pen microphone. And I</p> <p>11 announced, I believe, to the front desk that I was</p> <p>12 going to be recording this conversation.</p> <p>13 Q. You talked this morning about intimidation.</p> <p>14 Have you ever assaulted any employee at the Mint?</p> <p>15 A. Not to my knowledge.</p> <p>16 Q. When you were speaking about intimidation, what</p> <p>17 did you include -- well, let me ask you this question:</p> <p>18 When you were talking about intimidation with</p> <p>19 Mr. Gearin, were you talking about physical</p> <p>20 intimidation?</p> <p>21 A. No. What you want with an employee, is you</p> <p>22 want them to respect you and, you know, bend to your</p> <p>23 wishes. You want them to work for you very hard, and</p> <p>24 you want to be -- you want to kind of intimidate them</p> <p>25 with your knowledge and your wherewithal. And you want</p>	<p style="text-align: right;">Page 180</p> <p>1 A. No. I've gotten old and fat. And, you know,</p> <p>2 that doesn't work anymore.</p> <p>3 Q. Did it ever work?</p> <p>4 A. You know, in the old days, you think you're</p> <p>5 tougher than you are. But I'll tell you what. I</p> <p>6 learned a long time ago that there's always somebody</p> <p>7 tougher. I've got a lot of big guys down there.</p> <p>8 Q. The reason you took the pen recorder to the</p> <p>9 Federal Way facility on May 18th, was it because you</p> <p>10 were afraid that what would happen is exactly what has</p> <p>11 happened?</p> <p>12 A. Exactly. And that's the reason I called</p> <p>13 before. Because I'll tell you what. I knew Mr. Gearin</p> <p>14 and Mr. Calvert have a reputation in this town of</p> <p>15 being --</p> <p>16 Q. I don't want you to talk about anybody's</p> <p>17 reputation in this town. Just answer the question.</p> <p>18 A. Well, my personal experience is that -- let's</p> <p>19 just say that they're not always truthful. And I</p> <p>20 wanted to do my best to avoid a problem.</p> <p>21 MR. FRUSH: I've got nothing further, Mike.</p> <p>22 Do you have any redirect on that stuff?</p> <p>23 MR. GEARIN: Yeah. I'll just ask a couple</p> <p>24 of follow-up questions.</p> <p>25 ///</p>
<p style="text-align: right;">Page 179</p> <p>1 them to, you know, be in awe so they join the team.</p> <p>2 Q. Have you yelled at employees?</p> <p>3 A. Yes.</p> <p>4 Q. Have employees yelled at you?</p> <p>5 A. Yes.</p> <p>6 Q. Was there a culture at the Mint -- well, I</p> <p>7 don't want to say culture. Were there occasions at the</p> <p>8 Mint when people would raise their voices and yell at</p> <p>9 each other in relation to work issues?</p> <p>10 A. We have a saying at the Mint: You can yell,</p> <p>11 scream, kick, do everything you can for your position.</p> <p>12 What we want is, we want passionate people. We don't</p> <p>13 want a bunch of drones. And I'll argue all day long</p> <p>14 with an employee. And I might, at the end, look at</p> <p>15 them and say, You know what? Are you willing to be</p> <p>16 fired over your position?</p> <p>17 And they'll say, Yes.</p> <p>18 And I'll say, Well, then, I guess we better go</p> <p>19 with your position because you're right.</p> <p>20 I want passionate employees. I want people</p> <p>21 that are willing to argue strenuously for their</p> <p>22 position. Because if they're not willing to do that,</p> <p>23 then they're not worth having.</p> <p>24 Q. Have you ever tried to physically intimidate</p> <p>25 the employees?</p>	<p style="text-align: right;">Page 181</p> <p>1 EXAMINATION</p> <p>2 BY MR. GEARIN:</p> <p>3 Q. Mr. Hansen, you just said that you instructed</p> <p>4 Ms. Krum to put the software in the safe at the Mint,</p> <p>5 right? You instructed her; that's the term you used.</p> <p>6 Do you recall that?</p> <p>7 A. Yeah. I told her that she should make two</p> <p>8 copies and she should -- I instructed her to give a</p> <p>9 copy to the managers to put in the safe down there.</p> <p>10 Q. But you didn't have any authority to give</p> <p>11 instructions to Ms. Krum at that point, did you?</p> <p>12 A. No. But it was good advice.</p> <p>13 Q. But you didn't have any authority to give her</p> <p>14 any instructions, correct?</p> <p>15 A. No. But I thought that would be a good thing</p> <p>16 for the Mint. I was still looking after the Mint's</p> <p>17 best interest.</p> <p>18 Q. Have you given other instructions to employees</p> <p>19 since Mr. Calvert was appointed?</p> <p>20 A. I have.</p> <p>21 Q. Why do you think you have authority to give</p> <p>22 instructions to employees?</p> <p>23 A. Because people call me up and ask me how to do</p> <p>24 certain things. There's many things that I used to do</p> <p>25 down there that nobody else knows how to do. And</p>



<p style="text-align: right;">Page 182</p> <p>1 people have called me in confidence and asked me, Hey,</p> <p>2 Ross, I have to do your job now. How do I do this?</p> <p>3 And I have given them instructions on how to do</p> <p>4 it. I'm looking after the best interest of the Mint.</p> <p>5 I want the Mint to succeed.</p> <p>6 Q. So you are interfering with the trustee's</p> <p>7 ability to run the company, aren't you, sir?</p> <p>8 A. No. Exactly the opposite. I'm assisting the</p> <p>9 trustee. The trustee asked for help. Then the trustee</p> <p>10 didn't want any of the employees to talk to me. So</p> <p>11 through the back door, they are calling me to say, How</p> <p>12 do I do this?</p> <p>13 And I'm telling them how to do it.</p> <p>14 Q. Do you think there's a difference between</p> <p>15 respect and intimidation, Mr. Hansen?</p> <p>16 A. Yes.</p> <p>17 Q. But you've used the term "intimidation." You</p> <p>18 said you've intimidated employees, haven't you?</p> <p>19 A. Yes, I have intimidated employees.</p> <p>20 Q. And intentionally so, correct?</p> <p>21 A. Not necessarily. But my mannerisms sometimes</p> <p>22 can be described as intimidating. I try not to. But</p> <p>23 I'm always amazed at what people think is intimidation.</p> <p>24 Q. You told employees that you killed a man in</p> <p>25 prison, right?</p>	<p style="text-align: right;">Page 184</p> <p>1 MR. GEARIN: That's a straightforward</p> <p>2 question.</p> <p>3 A. I'm not going to answer that.</p> <p>4 Q. (BY MR. GEARIN) Was it truthful?</p> <p>5 A. I'm not going to answer that. I take the fifth</p> <p>6 amendment.</p> <p>7 Q. You said you told the receptionist that you</p> <p>8 were recording the conversation with Ms. Trunkett and</p> <p>9 Mr. Huffman. Was --</p> <p>10 MR. FRUSH: Objection. You're</p> <p>11 mischaracterizing his testimony. He said he told the</p> <p>12 receptionist that he was going to be recording the</p> <p>13 visit, or words to that effect. He didn't mention</p> <p>14 Ms. Trunkett or Mr. Huffman.</p> <p>15 MR. GEARIN: Okay. That's fair.</p> <p>16 Q. (BY MR. GEARIN) You told the receptionist that</p> <p>17 you were going to be recording the visit, correct?</p> <p>18 A. Correct.</p> <p>19 Q. Was Mr. Huffman in the presence of the</p> <p>20 receptionist when you said you were going to record the</p> <p>21 visit?</p> <p>22 A. He was not.</p> <p>23 Q. Was Ms. Trunkett in the presence of the</p> <p>24 receptionist?</p> <p>25 A. I believe she was just coming around the corner</p>
<p style="text-align: right;">Page 183</p> <p>1 MR. FRUSH: Objection.</p> <p>2 A. I don't want to talk about anything that may or</p> <p>3 may not have happened in prison.</p> <p>4 Q. (BY MR. GEARIN) But you told employees that.</p> <p>5 And that's a form of intimidation, isn't it?</p> <p>6 MR. FRUSH: Objection.</p> <p>7 A. I don't think that's germane to this</p> <p>8 conversation.</p> <p>9 Q. (BY MR. GEARIN) Well, I think you need to</p> <p>10 answer the question, sir. Did you tell employees --</p> <p>11 you already told me that. You told me earlier in the</p> <p>12 deposition that you have told employees that you killed</p> <p>13 a man in prison, right?</p> <p>14 A. Yes.</p> <p>15 Q. Do you think that's a form of intimidation?</p> <p>16 A. No.</p> <p>17 Q. You don't think that's a form of intimidation?</p> <p>18 A. No. And I don't think we're in prison anymore.</p> <p>19 Q. Is it true that you killed a man in prison?</p> <p>20 A. I don't want to talk about what may or may not</p> <p>21 have happened in prison.</p> <p>22 Q. Was it truthful when you told the employees</p> <p>23 that you killed a man in prison?</p> <p>24 MR. FRUSH: Objection. You're arguing with</p> <p>25 him. He's already answered you.</p>	<p style="text-align: right;">Page 185</p> <p>1 at the time.</p> <p>2 Q. Did she hear you tell the --</p> <p>3 A. I don't know if she did or not.</p> <p>4 Q. But you already told me, before, that you</p> <p>5 didn't tell Ms. Trunkett that you were recording the</p> <p>6 conversation, right?</p> <p>7 A. I did not specifically tell her that I was</p> <p>8 recording the conversation.</p> <p>9 Q. And you didn't tell Mr. Huffman that you were</p> <p>10 recording the conversation?</p> <p>11 A. No. Mr. Huffman came upon me just as I was</p> <p>12 getting ready to leave.</p> <p>13 Q. Where did you have the pen recorder?</p> <p>14 A. I believe it was in my front pocket.</p> <p>15 Q. Was that designed to -- a pen recorder is</p> <p>16 designed to be innocuous, so that nobody knows it's</p> <p>17 there?</p> <p>18 A. It was just a small recording device that I</p> <p>19 just thought was handy to have, that if I had to -- you</p> <p>20 know, it was just a cheap, inexpensive way of being</p> <p>21 able to record a conversation.</p> <p>22 Q. Is it true, Mr. Hansen, that you have stopped</p> <p>23 reaching out to employees of the Mint since the</p> <p>24 beginning of June of 2016?</p> <p>25 A. Yes.</p>



<p style="text-align: right;">Page 194</p> <p>1 violate the work product -- the scope of work product. 2 And some of these questions are related to his 3 co-shareholder in Medallic, Richard Bressler. And we 4 don't think that, at this stage, that's appropriate, 5 with the lawyers being participants in that 6 transaction.</p> <p>7 On the Tomball transaction itself, we think 8 there's a lack of relevance. And we certainly think 9 that the facts you have before you, Your Honor -- the 10 fact that he came in with a \$100,000 check, the fact 11 that he tried to make it a nonrefundable deposit, and 12 the fact that he brought in an email from Mr. Parish, 13 who was deposed last week by Mr. Gearin's law firm, and 14 who has received what we consider to be correspondence 15 trying to interfere with his relationship with 16 Mr. Hansen -- it's a real strong indicator to us that 17 they would do the same thing if additional sources of 18 financing were exposed.</p> <p>19 THE COURT: All right. Thank you, 20 Mr. Frush.</p> <p>21 With regards to questions about the 22 availability or sources of financing that might have 23 been available or that Mr. Hansen was relying on to 24 purchase the Tomball facility, those questions will be 25 answered. They are relevant to the motion. I have</p>	<p style="text-align: right;">Page 196</p> <p>1 disclose the sources of his financing. So I'm going to 2 overrule the objection with regard to what happened on 3 the Tomball -- the attempts to acquire the Tomball 4 assets.</p> <p>5 As for going forward, I'll sustain the 6 objection to questions about the source of funding that 7 Medallic may turn to to acquire assets. At this point, 8 there's nothing on the table, and I don't see that 9 Mr. Hansen should need to disclose what he might do in 10 the future. I don't see how that's relevant to this 11 motion at this time.</p> <p>12 MR. GEARIN: Well, Your Honor, to be clear, 13 I'll let you know that we conceded that point for 14 purposes of today's deposition. We don't think it's 15 relevant. The trustee does not think those issues are 16 now relevant as to future financing. We are really 17 talking about the Tomball sale financing.</p> <p>18 THE COURT: All right. It sounded like, at 19 the beginning, you were both on two ships passing in 20 the night. But at least for this motion, it appears 21 that questions about Medallic's potential ability to 22 fund a purchase of any assets is not relevant to this 23 motion. So that's the Court's ruling.</p> <p>24 Is there anything further that the parties 25 need?</p>
<p style="text-align: right;">Page 195</p> <p>1 read the motion; and I've actually read the response 2 already, in anticipation of there being a contested 3 hearing this Friday. So I am familiar with the 4 trustee's position.</p> <p>5 As I understand the trustee's position -- 6 and I'm not weighing in on the merits of it -- but the 7 trustee's position is that among the things that the 8 trustee has alleged, is that Mr. Hansen falsely 9 asserted an ability to purchase the Tomball assets and 10 was doing so for improper purposes. Whether or not he 11 had the ability to pursue an actual sale -- or an 12 actual purchase and sale of its assets is relevant or 13 can lead to the discovery of admissible evidence. So 14 I'm going to overrule the relevance objection.</p> <p>15 As to the work product objection, I do not 16 see how that comes into play at all. The attorneys 17 were not running the deal. I'm assuming the attorneys 18 were just advising people. The attorney work product, 19 the last time I looked at the doctrine, involved the 20 attorneys' impressions and thoughts. That's not what 21 is going on here. Who Mr. Hansen talked to is not -- I 22 don't see how that could possibly be privileged or 23 protected. And whether or not he had the ability to 24 close certainly would not be protected. And if he was, 25 in fact, the successful bidder, he would have to</p>	<p style="text-align: right;">Page 197</p> <p>1 MR. FRUSH: Not from Mr. Hansen, Your 2 Honor. We appreciate your courtesy and your time.</p> <p>3 MR. GEARIN: Not from the trustee either.</p> <p>4 THE COURT: All right. I'd like to try to 5 handle these matters like this going forward so the 6 parties get a quick response and can move on. So I'm 7 happy to do that.</p> <p>8 MR. GEARIN: Thank you, Your Honor. 9 MR. FRUSH: Appreciate it, Your Honor.</p> <p>10 Thank you.</p> <p>11 THE COURT: You're welcome. See you on 12 Friday. Goodbye.</p> <p>13 (The conference call was disconnected.) 14 (Discussion off the record.)</p> <p>15 MR. GEARIN: Okay. We're on the record. 16 Let's go back and see where we were.</p> <p>17 Q. (BY MR. GEARIN) All right. Mr. Hansen, 18 refreshing the context of what we were discussing, we 19 were talking about your participation in the hearings 20 on the sale of the Tomball assets. Do you recall that? 21 A. Yes. 22 Q. Who had agreed to provide the funding for 23 Medallic's acquisition of the Tomball assets? 24 A. Mr. Parish said that he would put up, up to a 25 million dollars of his money. But he did not want to</p>



<p style="text-align: right;">Page 198</p> <p>1 put it up on a long-term basis. No more than a year.</p> <p>2 So that gave me a year to come up with other financing.</p> <p>3 And my other financing was probably going to be worked</p> <p>4 out with Vanguard.</p> <p>5 Q. So your testimony is that Mr. Parish agreed to</p> <p>6 put up at least a million dollars in supporting your</p> <p>7 ability to acquire the Tomball assets?</p> <p>8 A. Yes.</p> <p>9 Q. Did anybody else agree to provide financing in</p> <p>10 connection with Medallic's acquisition of the Tomball</p> <p>11 assets?</p> <p>12 MR. FRUSH: I believe he had conversations</p> <p>13 with Vanguard before the actual --</p> <p>14 MR. GEARIN: He told me, in his deposition,</p> <p>15 that Vanguard did not -- in this deposition, he told me</p> <p>16 that Vanguard did not make a commitment to provide</p> <p>17 financing.</p> <p>18 MR. FRUSH: Well, that's not my</p> <p>19 recollection of the testimony.</p> <p>20 MR. GEARIN: Well, then let's go back</p> <p>21 through it again.</p> <p>22 Q. (BY MR. GEARIN) Did anybody, other than</p> <p>23 Mr. Parish, agree to provide financing to fund the</p> <p>24 Tomball acquisition at the end of May 2016?</p> <p>25 A. Only Mr. Parish made a firm commitment.</p>	<p style="text-align: right;">Page 200</p> <p>1 willingness to provide financing for the Tomball sale?</p> <p>2 A. Yes.</p> <p>3 Q. And this is the email that you handed to me</p> <p>4 here in my offices at the auction of the Tomball</p> <p>5 assets, correct?</p> <p>6 A. Correct.</p> <p>7 Q. In this email, Mr. Parish says: I am Mike</p> <p>8 Parish. I'm executive vice president of Olympic</p> <p>9 Trading Corp. And I have the financial wherewithal to</p> <p>10 complete this transaction in question. Mike Parish.</p> <p>11 Correct?</p> <p>12 A. Correct.</p> <p>13 Q. It doesn't say, in this email: I've agreed to</p> <p>14 provide a million dollars' worth of financing, does it?</p> <p>15 A. No, it does not.</p> <p>16 Q. Is there any other document that Mr. Parish</p> <p>17 gave you, where he gave you a written commitment to</p> <p>18 provide a million dollars' worth of financing?</p> <p>19 A. No. I think that was the reason that you</p> <p>20 successfully argued that I was not allowed to bid.</p> <p>21 Q. Do you know that Mr. Parish has a million</p> <p>22 dollars in available funds -- in readily available</p> <p>23 funds to provide a loan of a million dollars to you?</p> <p>24 A. He told me he did.</p> <p>25 Q. Do you know that independently?</p>
<p style="text-align: right;">Page 199</p> <p>1 Vanguard said that they needed to look at it. And if</p> <p>2 they had more time, they would probably go ahead and do</p> <p>3 the deal. But we did not have time to negotiate out a</p> <p>4 deal. So I had no firm commitment from Vanguard, but I</p> <p>5 felt like I could get one if I had the time.</p> <p>6 Q. Did anybody else make a commitment to provide</p> <p>7 funding, other than what we've talked about here,</p> <p>8 Mr. Parish/Olympic Trading, and Vanguard?</p> <p>9 A. No.</p> <p>10 (Deposition Exhibit 6 was marked for</p> <p>11 identification.)</p> <p>12 Q. (BY MR. GEARIN) Handing you now what has been</p> <p>13 marked as Deposition Exhibit 6, Mr. Hansen. Do you</p> <p>14 recognize that email?</p> <p>15 A. Yes.</p> <p>16 Q. Is that an email from Mr. Parish to you on --</p> <p>17 it looks like it's dated May 27, 2016, at 1:32 a.m.; is</p> <p>18 that correct?</p> <p>19 A. No. It says it was sent on 5/27 at 12:40 p.m.</p> <p>20 Q. Oh, I see what you're looking at. Thank you.</p> <p>21 But it is an email from Mr. Parish to you,</p> <p>22 correct?</p> <p>23 A. Yes.</p> <p>24 Q. And is this the email that you've referred to</p> <p>25 before as the evidence that Mr. Parish provided of his</p>	<p style="text-align: right;">Page 201</p> <p>1 A. No, I do not.</p> <p>2 Q. Do you have any idea of what Mr. Parish's net</p> <p>3 worth is?</p> <p>4 A. Well, I attended his deposition the other day,</p> <p>5 and I heard his deposition.</p> <p>6 Q. So --</p> <p>7 MR. FRUSH: Answer the question.</p> <p>8 Q. (BY MR. GEARIN) So do you know what his net</p> <p>9 worth is?</p> <p>10 A. I think he said between a million and a half</p> <p>11 and 2 million.</p> <p>12 Q. That's his net worth?</p> <p>13 A. Yes.</p> <p>14 Q. Did it surprise you to hear that his net worth</p> <p>15 was a million and a half to \$2 million?</p> <p>16 A. I didn't know what his net worth was. I think</p> <p>17 there's some other issues regarding his insurance</p> <p>18 settlement at this time.</p> <p>19 Q. All right. Let's talk about Medallic's assets</p> <p>20 as we sit here today. Does Medallic have a million</p> <p>21 dollars' worth of cash?</p> <p>22 A. No, we do not.</p> <p>23 Q. How much cash does Medallic have?</p> <p>24 A. Medallic has accounts receivable of almost</p> <p>25 \$2 million it's owed by the trustee --</p>



<p style="text-align: right;">Page 202</p> <p>1 Q. Mr. Hansen, you're not answering my question.</p> <p>2 A. You just asked me about its assets.</p> <p>3 Q. I asked you about cash. How much cash --</p> <p>4 MR. FRUSH: How does this bear on the</p> <p>5 contempt motion?</p> <p>6 MR. GEARIN: We've already talked about</p> <p>7 this. You already told me these were fair questions</p> <p>8 for me to ask about.</p> <p>9 MR. FRUSH: Well, I didn't object to the</p> <p>10 questions. I guess -- you know, you're going to do a</p> <p>11 30(b)(6) on Medallie, I think, at some point.</p> <p>12 MR. GEARIN: These have to do with the</p> <p>13 allegations that the trustee has that Mr. Hansen has</p> <p>14 told employees that the Mint is going away and that</p> <p>15 Medallie is prepared to hire them all.</p> <p>16 MR. FRUSH: Okay. I see your point. A</p> <p>17 certain amount of it is fine.</p> <p>18 MR. GEARIN: The point of it is, Jim --</p> <p>19 MR. FRUSH: I got you.</p> <p>20 Q. (BY MR. GEARIN) So, Mr. Hansen, how much cash</p> <p>21 does Medallie have?</p> <p>22 A. Medallie, right now, only has just a few</p> <p>23 hundred in the bank.</p> <p>24 Q. A few hundred dollars?</p> <p>25 A. Yes. It should be receiving about \$60,000 a</p>	<p style="text-align: right;">Page 204</p> <p>1 but -- well, that may be fair.</p> <p>2 MR. FRUSH: I heard the word "sustained."</p> <p>3 MR. GEARIN: Well, I think he sustained an</p> <p>4 objection to a point that we had already agreed to</p> <p>5 withdraw, but yeah.</p> <p>6 MR. FRUSH: You're just sneakily getting</p> <p>7 behind -- going around the building and coming in the</p> <p>8 back door. It was a good effort, but I don't think</p> <p>9 it's appropriate.</p> <p>10 MR. GEARIN: I'm not doing anything that's</p> <p>11 sneaky. Everything I've done thus far has been</p> <p>12 straight to the point. I've asked direct questions,</p> <p>13 and I --</p> <p>14 MR. FRUSH: Well, sneaky is -- I said it</p> <p>15 with a smile. I'm just saying that you're taking a</p> <p>16 different approach to it, and I understand that. I</p> <p>17 don't think it's an appropriate line of questioning.</p> <p>18 Q. (BY MR. GEARIN) At any time, Mr. Hansen, from</p> <p>19 the time the Mint bankruptcy case was filed to today,</p> <p>20 has Medallie been capable of hiring a number of</p> <p>21 employees of the Mint?</p> <p>22 A. Yes.</p> <p>23 Q. How would Medallie pay those employees?</p> <p>24 A. With a check.</p> <p>25 Q. A check on the bank account that holds a few</p>
<p style="text-align: right;">Page 203</p> <p>1 month from the trustee, once the trustee gets off</p> <p>2 the --</p> <p>3 Q. I'm not asking you what it should have. I'm</p> <p>4 asking you what the cash assets are in the company.</p> <p>5 A. Yes.</p> <p>6 Q. Between April 1st and today, has there ever</p> <p>7 been more than a few hundred dollars in Medallie's bank</p> <p>8 account?</p> <p>9 A. No.</p> <p>10 Q. Does Medallie have a banking relationship with</p> <p>11 any bank?</p> <p>12 A. Yes, we do.</p> <p>13 Q. Does it have a line of credit with any bank?</p> <p>14 A. Not with a bank.</p> <p>15 Q. Does it have a line of credit with any other</p> <p>16 party?</p> <p>17 A. Yes.</p> <p>18 Q. Who?</p> <p>19 A. Again, I don't think that's --</p> <p>20 MR. FRUSH: I don't think we're going to</p> <p>21 get into Medallie's funding. I think he said the</p> <p>22 funding for Medallie going forward is not appropriate</p> <p>23 at this point. He sustained my objection on that.</p> <p>24 MR. GEARIN: Well, on the issue as to</p> <p>25 whether or not somebody made a commitment to financing,</p>	<p style="text-align: right;">Page 205</p> <p>1 hundred dollars?</p> <p>2 A. Currently.</p> <p>3 MR. GEARIN: Okay. Thank you. I have</p> <p>4 nothing further.</p> <p>5 MR. FRUSH: Let me follow up on Medallie.</p> <p>6 EXAMINATION</p> <p>7 BY MR. FRUSH:</p> <p>8 Q. How much does Medallie have in accounts</p> <p>9 receivable, if you know?</p> <p>10 A. Almost \$2 million.</p> <p>11 Q. Who owes them all that money?</p> <p>12 A. The trustee owes approximately \$200,000</p> <p>13 postpetition and about 1.7 million prepetition.</p> <p>14 Q. Is Medallie a general unsecured creditor, or</p> <p>15 are they secured?</p> <p>16 A. I think that's for the Court to determine.</p> <p>17 Q. Does Medallie have counsel?</p> <p>18 A. They do.</p> <p>19 Q. Is that the Bucknell Stehlik firm?</p> <p>20 A. It is. Mr. Bucknell has told me that the</p> <p>21 issues of accounts receivable -- well, I don't want to</p> <p>22 get into what --</p> <p>23 Q. I don't want to get into that.</p> <p>24 Funds have been advanced, of considerable</p> <p>25 amounts, to Mr. Bucknell's law firm, haven't they, on</p>

